

EXHIBIT G –  
Declaration of  
Dr. Samantha Moffitt

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

Case No.

ENVIGO RMS, LLC,

*Defendant.*

**DECLARATION OF DR. SAMANTHA MOFFITT**

I, Samantha Moffitt, declare the following to be true and correct to the best of my knowledge and based on my personal knowledge and on information collected from other members of the search warrant team:

1. I am employed with MedVet NOVA as an Associate Emergency Veterinarian. I have been working for MedVet NOVA for a total of 5 years. In my current role as an Associate Emergency Veterinarian I receive incoming emergencies while overseeing in-hospital patients, maintain critical care treatment for hospitalized patients, perform examinations, diagnostics, and treatments. I also perform emergency surgical procedures and work with and collaborate with specialists about cases.

2. I received my Bachelor of Science in Animal Sciences from Purdue University in 2007. I then received my Doctor of Veterinary Medicine from Ross University of Veterinary Medicine in 2011. Afterward, I did a clinical year of veterinary medicine at North Carolina State University in Raleigh, NC from May 2010 until June 2011. I then finished an emergency and critical care internship at the Veterinary Emergency and Specialty Center in Richmond, VA from June 2011 until July 2012.

3. I have been working with the Virginia animal fighting taskforce for six years as a veterinarian. In my work on the task force, I have worked as a veterinarian on animal cruelty cases, dog fighting cases and cockfighting cases. I have been involved in ten major animal cruelty investigations and more than one hundred additional court cases.

4. I have taught classes for animal control officers on animal cruelty and common animal diseases.

5. I am the Designated Lead Veterinarian assisting the United States in the execution of the federal search warrant at Envigo RMS's Cumberland, Virginia facility. As the Designated Lead Veterinarian, I am responsible for overseeing the eleven assessment teams that are conducting head-to-tail examinations of each of the beagles at the Cumberland Facility. I am also responsible for providing expert advice to the assessment teams with respect to veterinary care for individual beagles.

6. Beginning on May 18, 2022, assessment teams under my supervision began conducting in-field exams of the beagles at the Cumberland facility. During this in-field exam, the assessment teams conducted head-to-tail exams of each dog and puppy assessed. Each dog received a body condition score (1: emaciated; 2: very thin; 3: thin; 4: ideal; 5: ideal; 6: overweight; 7: heavy; 8: obese; and 9: grossly obese). Each dog also received a dental grade (1: tartar and plaque present; 2: swollen gums; 3: bleeding gums; 4: loose teeth). The assessment teams completed medical findings for each dog and, based on the medical finding, provided a recommended treatment. Under my supervision the assessment team also determined that certain dogs needed to be housed separately, due to factors such as a need to quarantine to prevent the further spread of infection or due to injury from fights with cagemates.

7. While conducting in-field exams on May 18, 2022, the assessment teams alerted me to two deceased puppies found in enclosures with their respective nursing mothers and littermates.

8. As the Designated Lead Veterinarian, I made the final determination as to whether a beagle was in “acute distress.” “Acute distress” means any animal requiring immediate veterinary treatment or other care to promptly alleviate a life threatening illness/injury or any suffering. For an animal to be determined to be in “acute distress,” I must agree that the animal meets the standard for “acute distress.” On May 18, 2022, 145 beagles were determined to be in “acute distress.”

9. In my veterinary expertise, puppies and younger dogs have food needs that are different from the food needs of adult dogs. Weaned puppies and younger dogs need to be fed more often and should be fed a diet that is higher in calorie and protein to meet their specific age-requirement needs.

Under penalty of perjury, pursuant to 28 U.S.C. § 1746(2), I declare the foregoing to be true and correct to the best of my knowledge.

Executed on May 19, 2022.

A handwritten signature in blue ink that reads "Samantha Moffitt DVM". The signature is written in a cursive style with a horizontal line underneath the name.

Samantha Moffitt, DVM